

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

FILED

August 30, 2024

KAREN MITCHELL

CLERK, U.S. DISTRICT
COURT

United States of America

v.

Naasson Hazzard

Case No.

3:24-MJ-829-BT

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 15th in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 1201(a)(1)

Kidnapping

This criminal complaint is based on these facts:

See attached Affidavit of SA Charles Self, HSI.

☒ Continued on the attached sheet.



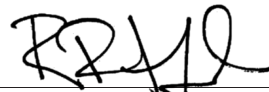
Complainant's signature

SA Charles Self, HSI

Printed name and title

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.

Date: August 30, 2024



Judge's signature

City and state: Dallas, Texas

REBECCA RUTHERFORD, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Charles Self, being duly sworn, depose and state the following:

INTRODUCTION

1. I have been a Special Agent with Homeland Security Investigations, Special Agent in Charge Dallas, since December 2023, and am assigned to the North Texas Trafficking Task Force (NTTTF).

2. I have gained experience in conducting human trafficking investigations through training, conversations with other law enforcement officers/agents, and through everyday work, including executing search warrants and interviewing individuals. I attended the Federal Law Enforcement Training Center's Criminal Investigators Training Program and Homeland Security Investigations (HSI) Special Agent Training. Prior to employment with HSI, I was a federal Task Force Officer with HSI for approximately five years. As a Task Force Officer, I have worked on multiple human trafficking investigations. I was a police officer in the state of Texas for ten years, in Colleyville, Texas. As a Colleyville Police Officer, I was a member of the Internet Crimes Against Children Task Force (ICAC) and have conducted numerous child pornography investigations.

3. As a federal agent, I am authorized to investigate violations of United States laws and to execute warrants issued under the authority of the United States. During such investigations, I have used a variety of methods to investigate criminal

activity including, but not limited to, visual surveillance, witness interviews and the use of search warrants.

4. The statements contained in this affidavit are based upon my investigation, information provided by HSI Special Agents and other members of law enforcement; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; information gathered from the service of subpoenas; the results of physical and electronic surveillance conducted by law enforcement personnel; independent investigation and analysis by HSI agents/analysts and computer forensic professionals; and my experience, training and background as a Special Agent with and a law enforcement officer.

5. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. Rather, I have set forth only the facts that I believe are necessary to establish probable cause in support of a criminal complaint charging **Naasson HAZZARD**, while in the Northern District of Texas and elsewhere, with a violation of 18 U.S.C. § 1201(a)(1), Kidnapping.

FACTS SUPPORTING PROBABLE CAUSE

6. On August 21, 2024, the HSI NTTTF received information from the San Diego County Sheriff's Office (SDSO) that Adult Victim 1 (AV1), a potential victim of human trafficking, and her minor child had been reported as missing persons at risk.

7. On August 21, 2024, NTTTF HSI Special Agent (SA) J. Hunter queried NCIC and confirmed the missing person reports were current and documented under SDSO case numbers CN24133835 and CN24133811.

Interview of Witness 1 (W1):

8. Thereafter, on August 21, 2024, at approximately 6:53 p.m., NTTTF HSI SA J. Hunter telephonically interviewed W1, the grandmother of AV1. W1 confirmed AV1 and her minor child reside with her in Poway, California.

9. W1 confirmed AV1 departed Poway, California, with her minor child on the week of August 5, 2024. According to W1, when AV1 departed, she was driving her blue Chevrolet Equinox sports utility vehicle bearing California license plate number 7VEG126. Before she left, AV1 told W1 she was going to be away for one month during which she would travel to Texas, to visit the family of her child's father.

10. W1 explained that she typically communicated with AV1 via cellular telephone daily. W1 last communicated with AV1 on August 14, 2024. W1 explained that she had made unsuccessful attempts to contact AV1 between August 14th and August 21, 2024. It was due to the lack of response, that W1 filed a missing person report. W1 identified the cellular telephone number belonging to AV1 as ending in 9048.

Interview of Witness 2 (W2)

11. On August 21, 2024, at approximately 10:00 p.m., NTTTF HSI SA J. Jones telephonically interviewed W2, a friend of AV1's.

12. W2 described the relationship with AV1 as "close friends" who communicated "almost every day." W2 explained that since October 2023, AV1 and W2 have shared their cellular device location information via the Apple "Find My Friends" mobile application.

13. W2 observed the application as AV1 traveled from California to Arizona and then to Houston and Dallas, Texas. According to W2, AV1 and W2 remained in regular communication throughout AV1's travel.

14. On the morning of August 15, 2024, W2 received a message from AV1 via the social media application TikTok. W2 placed calls and messages to AV1 between August 15th and August 21, 2024, without receiving a response. W2 confirmed the last location available for AV1 on the "Find My Friends" application was in Dallas, Texas. W2 identified the cellular telephone number belonging to AV1 as ending in 9048.

Commercial Sex Advertisements

15. From August 6th through August 15, 2024, there were commercial sex advertisements posted on websites featuring photographs of AV1 linked to cellular telephone number ending in 9048 in multiple locations.

16. Between August 7th and August 8, 2024, AV1's commercial sex advertisements were posted in Tucson, Arizona and hosted on various commercial sex advertisement websites.

17. Between August 9th and August 10, 2024, AV1's commercial sex advertisements were posted in the area of Houston, Texas, and hosted on various commercial sex advertisement websites.

18. Between August 9th until August 15, 2024, AV1's commercial sex advertisements were posted in the area of Dallas, Texas, and hosted on various commercial sex advertisement websites.

19. The final commercial sex advertisement on the website "[REDACTED]games" was posted on August 15, 2024, advertising AV1's availability in Addison, Texas.

20. The commercial sex advertisements were linked to AV1's cellular telephone number, contained photographs of AV1, and contained a link to an account on the social media website Instagram bearing username "[REDACTED]lady."

21. There were additional commercial sex advertisements for AV1 on the website "[REDACTED] world." This commercial sex advertisement website is subscription based, requires a paid membership, and "auto reposts" advertisements. As the advertisements do not require a user to log in to post the advertisements, and are "auto re-posted" regularly, they have been excluded from the above timeline.

Exigent Request for Instagram Information

22. HSI SA J. Jones accessed the information available to the public on the Instagram account bearing username “[REDACTED]ladyy” based upon its presence within the commercial sex advertisements linked to AV1’s cellular telephone number. Ownership of the account was confirmed based upon photographs posted to the account depicting AV1.

23. On August 21, 2024, HSI SA Jones submitted an exigent request to Meta requesting location and login information for the “[REDACTED]lady” Instagram account. Records were received from Meta on August 22, 2024.

24. The records received from Meta confirmed the Instagram account was registered using a date of birth that matched AV1’s. The last time the account was accessed, according to the I.P. address log, was on August 15, 2024, at approximately 8:23 p.m.

Electronic Database Queries for AV1’s Vehicle License Plate

25. On August 21, 2024, NTTTF HSI Task Force Officer (TFO) S. Cooper and NTTTF HSI SA J. Hunter queried CA/US license plate number 7VEG126, in an electronic database.

26. On August 6th, and 7th, 2024, CA/US license plate number 7VEG126 was captured in Peoria, Arizona.

27. Between August 9th and August 11th, 2024, CA/US license plate number 7VEG126 was captured in Houston, Texas.

28. Between August 12th and August 15th, 2024, CA/US license plate number 7VEG126 was captured in Dallas, Texas.

29. Review of the license plate captures revealed CA/US license plate number 7VEG126 was placed at an address a hotel located on W. Northwest Highway, Dallas, Texas on August 14th and 15th, 2024.

30. License plate number CA/US 7VEG126 was captured on August 18, 2024, in Dallas, Texas, while the vehicle was being transported on a tow truck.

Dallas Hotel

31. On August 21, 2024, NTTTF HSI SA J. Hunter traveled to the hotel located on W. Northwest Highway, Dallas, Texas. Staff at the hotel provided records confirming AV1 checked into hotel room 302 on August 12, 2024, and rented the room until August 17, 2024. AV1 was automatically checked out of the hotel room on August 17, 2024.

Discovery of AV1's Vehicle

32. On August 21, 2024, NTTTF HSI SA F. Mustafa, TFO S. Cooper, and TFO M. Grice travelled to a tow yard located on South Central Expressway in Dallas, Texas, where they discovered AV1's blue Chevrolet Equinox sports utility vehicle bearing CA/US license plate number 7VEG126.

33. NTTTF HSI TFO S. Cooper conducted a search of the vehicle for items that could give an indication of AV1's location. A backpack, shoes, prescription medicine, identification documents, condoms, receipts, and an electronic tablet were

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observed within the vehicle. The identification documents and prescription medicine belonged to AV1.

Exigent Request for Information Related to Cellular Device Belonging to AV1

34. On August 21, 2024, NTTTF HSI Criminal Analyst (CA) Gomez submitted an exigent request to T-Mobile for location information for AV1's cellular telephone number. T-Mobile could not provide a location, indicating the cellular device linked to telephone number ending in 9048 was turned off.

35. On August 21, 2024, NTTTF HSI CA Gomez submitted a law enforcement summons to T-Mobile for call detail records and subscriber information related to cellular telephone number ending in 9048. The records received from T-Mobile identified the subscriber of the telephone number as "[AV1] at [REDACTED], Poway, CA."

36. Analysis of the call detail records received from T-Mobile revealed the final outgoing call from AV1's cellular telephone number was made on August 15, 2024 at 6:35 p.m.

37. Call detail records received from T-Mobile for AV1's cellular telephone number revealed approximately thirteen communications were exchanged between her cellular telephone number and a cellular telephone number identified as 830-743-8758 between August 13th and August 14, 2024.

38. Electronic database queries reveal that cellular telephone number 830-743-8758 has been linked to Naasson **HAZZARD**.

Observation of AV1

39. On August 22, 2024, NTTTF TFO M. Grice went to Location 1 located in Dallas, Texas, in the Northern District of Texas. The area surrounding Location 1 has been designated by the Dallas Police Department as a high crime area for prostitution. NTTTF TFO Grice met with the manager of Location 1 and reviewed video footage from their security cameras.

40. The manager of Location 1 recalled a vehicle that was abandoned within the parking lot on the night of August 15, 2024. The vehicle was identified as the blue Chevrolet Equinox bearing CA/US license plate number 7VEG126, belonging to AV1. The manager had the vehicle towed from Location 1 on August 18, 2024.

41. TFO Grice viewed surveillance video from the night of August 15, 2024, and positively identified AV1 as she arrived at Location 1 at approximately 9:03 p.m. AV1 was observed in a pair of thong style underwear, bra, and black high heeled shoes. AV1 was observed with a cellular telephone.

42. At approximately 9:27 p.m., a blue semi-truck with a trailer, bearing TX/US license plate number R70-1816 was observed entering the Location 1 parking lot. AV1 approached the semi-truck and entered the vehicle. The semi-truck turned around in the parking lot and departed Location 1.

Identification of Semi-Truck Bearing TX/US License Plate Number R70-1816

43. Electronic database queries of TX/US license plate number R70-1816 revealed the vehicle was registered to “The Enjoyment LLC” in Austin, Texas. The

Texas Secretary of State database confirmed the registered agent of the LLC as “Naasson **HAZZARD**” and the address associated with the “The Enjoyment LLC” was confirmed as **HAZZARD**’s residence.

Exigent Request for Information Related to Cellular Device Belonging to
HAZZARD

44. On August 22, 2024, NTTTF HSI TFO Cooper submitted an exigent law enforcement request to AT&T for the cellular device linked to telephone number 830-743-8758 and belonging to **HAZZARD**. AT&T responded to the law enforcement request with historical precision location information, current precise location information provided every fifteen minutes, and historical call and text message data for cellular telephone number 830-743-8758.

45. On August 23, 2024, NTTTF HSI CA Gomez submitted an exigent request to AT&T for subscriber information and call detail records for cellular telephone number 830-743-8758. The response from AT&T confirmed “Naasson **HAZZARD**” as the financially liable party, billing party and user associated with cellular telephone number 830-743-8758.

46. Cellular telephone number 830-743-8758 was previously identified during analysis of call detail records for AV1’s cellular telephone number. The call details records revealed that during the two days before AV1 entered the semi-truck belonging to **HAZZARD**, the cellular devices exchanged approximately thirteen calls and/or text messages.

47. AT&T records showed that on and between August 13th and 14, 2024, when **HAZZARD** was communicating with AV1, **HAZZARD**'s cellular telephone number 830-743-8758 was linked to a Samsung cellular telephone, Model SM-S928U, IMEI 35204883493019.

Surveillance of **HAZZARD**

48. On August 22, 2024, NTTTF HSI SA J. Stewart responded to **HAZZARD**'s residence, identified in Austin, Texas.

49. NTTTF HSI SA J. Stewart observed **HAZZARD**'s semi-truck bearing TX/US license plate number R70-1816 parked outside the apartment complex and initiated surveillance of the vehicle. At approximately 8:34 p.m., NTTTF HSI SA Stewart observed the semi-truck departing and followed.

50. NTTTF HSI SA Stewart maintained surveillance as the semi-truck travelled down Interstate-35 to a cement company located in Buda, Texas.

51. At approximately 9:32 p.m., NTTTF HSI SA Stewart, along with Texas Department of Public Safety (DPS) Agents, Buda Police Department Officers, and Hays County Sheriff's Deputies, activated their police lights and ordered the occupants of the semi-truck out of the vehicle. **HAZZARD** and his wife, identified as R. Hazzard, were detained and transported to the Buda Police Department in Buda, Texas.

Interview of Naasson **HAZZARD**:

52. On August 22, 2024, in Buda, Texas, NTTTF HSI SA J. Stewart conducted an interview of **HAZZARD**. **HAZZARD** waived his Miranda rights and elected to make a statement. **HAZZARD** confirmed AV1 entered his semi-truck in Dallas, Texas, on the night of August 15, 2024, at Location 1. **HAZZARD** confirmed he exchanged cellular communications with AV1. **HAZZARD** declined to provide location or additional information regarding the whereabouts of AV1.

Interview of R. **HAZZARD**:

53. On August 22, 2024, in Buda, Texas, NTTTF HSI SA J. Stewart conducted an interview of R. Hazzard. R. Hazzard waived her *Miranda* rights and opted to make a statement. R. Hazzard identified cellular telephone number 830-743-8758, as belonging to **HAZZARD**.

Probable Cause Arrest of **HAZZARD** in Hays County, Texas:

54. On August 23, 2024, NTTTF HSI TFO D. Hatch, a Detective with the Dallas Police Department, submitted a Complaint and Affidavit of Probable Cause for Arrest to a Magistrate Judge in Hays County, Texas, for the offense of kidnapping. The affidavit was signed by the Magistrate Judge on August 23, 2024, and **HAZZARD** was booked into the Hays County Jail.

Issuance of Arrest Warrant in Dallas County, Texas

55. On August 23, 2024, NTTTF HSI TFO M. Grice, an Investigator with the Dallas County District Attorney's Office, submitted an affidavit in support of an

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arrest warrant in Dallas County, Texas, for the offense of Aggravated Kidnapping. The warrant was issued on August 23, 2024. **HAZZARD** was placed under arrest pursuant to the arrest warrant and booked into the Travis County Jail.

Analysis of Precise Location Information for Cellular Device Belonging to

HAZZARD August 15th to August 16, 2024

56. On August 15, 2024, at approximately 9:27 p.m., the device linked to cellular telephone number 830-743-8758, herein and after referred to as the “Device,” was present in the parking lot of Location 1. At this same time and location, surveillance footage collected from Location 1, showed AV1 entering **HAZZARD**’s semi-truck.

57. Between 9:32 p.m. and 9:49 p.m., the Device was in the area of the 2800 block of Dairy Milk Drive, Dallas, Texas for approximately seventeen minutes.

58. At approximately 10:02 p.m., the Device was in the area of the 4100 block of the Lyndon B. Johnson Freeway, in Dallas, Texas. Given the distance and time between 9:49 p.m and 10:02 p.m., the Device was in transit eastbound on Lyndon B. Johnson Freeway.

59. From approximately 10:22 p.m. until 11:04 p.m., the Device was in transit Interstate 30 eastbound near Greenville, Texas.

60. On August 16, 2024, from approximately 12:01 a.m. to 12:30 a.m., the Device was in transit from Interstate 30 at FM 269S to Interstate 30 at Texas Hwy 37, in the Mount Vernon, Texas area.

61. At approximately 1:04 a.m., the Device showed a location of Texas highway 271 south of Mount Vernon in the 4000 block in Pittsburg, Texas. At approximately 1:40 a.m., the Device was located near Texas Hwy 11 and FM 4220.

62. From approximately 1:58 a.m. to 2:35 a.m., the Device showed a location at Texas Hwy 11 near Big Cypress Creek and Texas road SE 15, in Titus, Texas. The device stayed in the area for approximately thirty-seven minutes.

63. On August 16, 2024, from approximately 2:54 a.m. to 4:00 a.m., the Device showed locations in rural areas in Pittsburg, Texas. The precise location information analyzed from that time period showed the Device was in transit.

64. At approximately 4:04 a.m., the Device showed a location at a power plant located in Titus, Texas.

Location of Human Remains Identified as AV1

65. On August 23, 2024, NTTTF members contacted members of the HSI Tyler office and provided them with the geographical location identified from August 16, 2024, where **HAZZARD**'s Device stopped for approximately thirty-seven minutes from 1:58 a.m. until 2:35 a.m.

66. HSI SA Williams and Thompson responded to the area of Texas Highway 11, near Big Cypress Creek and Texas road SE 15, in Titus, Texas. As SAs began a canvas search they were approached by a witness ("W3") who lived in the

area. W3 told the HSI SAs that he observed a semi-truck during the early morning hours of August 16, 2024, parked on Texas Hwy 11.

67. W3 guided HSI SAs Williams and Thompson to the area where he last saw the semi-truck parked. A search of the area revealed human remains concealed within a wooded area close to Texas Hwy 11.

68. A field examination of the human remains revealed the presence of a tattoo on the back of the left thigh. The tattoo was of the word “KROSS.” An analysis of commercial sex advertisements featuring photographs of AV1 confirmed a tattoo of the word “KROSS” on the back of her left thigh.

69. A field examination of the human remains revealed a black plastic bag secured around the head. The clothing on the remains included a pair of thong style underwear, bra, and a pair of black high heeled women’s shoes. These clothing items were consistent with those observed in the surveillance footage recovered from Location 1, showing AV1 entering the semi-truck belonging to **HAZZARD**.

Recovery of Cellular Telephone Tentatively Identified as belonging to AV1

70. W2 provided a final location notification she received from the cellular device belonging to AV1. The location showed that on August 19, 2024, the “Find My Friends” application sent one final alert to W2 and provided a location in the area of the 4100 block of the Lyndon B. Johnson Freeway, in Dallas, Texas, for AV1’s device.

71. This location matched the route taken by **HAZZARD**, identified during the analysis of his Device. On August 15, 2024, at approximately 10:02 p.m., approximately thirty-six minutes after AV1 entered **HAZZARD**'s semi-truck, his Device was in the area of the 4100 block of the Lyndon B. Johnson Freeway, in Dallas, Texas.

72. On August 23, 2024, NTTTF Supervisory Special Agent (SSA) J. Perez, NTTTF HSI SA F. Mustafa, and HSI SA Rodriguez, along with members of the Dallas Police Department arrived at the location to conduct a canvas search for AV1's cellular device.

73. During the search, NTTTF SSA Perez and SA Mustafa observed an Apple iPhone laying in the exit lane from the "TEXpress" lanes to the eastbound Interstate 635 frontage road. SSA Perez recovered the device.

74. The Apple iPhone located had damage to both the front screen and back of the device. Based on my training and experience, this damage is consistent with a cellular device contacting a roadway with force.

75. HSI SA Jones consulted with a Certified Forensic Analyst (CFA) assigned to HSI Dallas. The CFA confirmed that an Apple iPhone, even after being turned off, may send a final signal as the battery dies to provide location information. This location information may have been transmitted to the "Find My Friends" application.

76. I am aware that Samsung cellular telephones are not manufactured in the State of Texas; therefore, the Samsung cellular telephone **HAZZARD** used to communicate with AV1 traveled in and affecting interstate and foreign commerce. Moreover, I am aware that the Internet is a means and facility of interstate and foreign commerce. Further, Interstate 30 is an interstate highway beginning in Fort Worth, Texas and continuing to Little Rock, Arkansas. Finally, I am aware that the hotel that AV1 rented from August 12th to August 17, 2024, is a large hotel chain with hundreds of locations throughout the United States.

CONCLUSION

77. Based on the foregoing facts and circumstances, I respectfully submit that there is probable cause to believe that on or about August 15, 2024, in the Northern District of Texas, **Naasson HAZZARD**, unlawfully seized, confined, inveigled, decoyed, kidnapped, abducted, or carried away and hold for ransom or reward or otherwise any person, namely Adult Victim 1, and in committing and in furtherance of the commission of the offense, **HAZZARD** used any means, facility, and instrumentality of interstate or foreign commerce.

[remainder intentionally left blank]

78. In consideration of the above, I respectfully request the Court issue a Complaint and Arrest Warrant authorizing the arrest of **Naasson HAZZARD**.



Charles Self
Special Agent
Homeland Security Investigations

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1, on August 30, 2024.



REBECCA RUTHERFORD
UNITED STATES MAGISTRATE JUDGE
NORTHERN DISTRICT OF TEXAS